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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OPERATING ENGINEERS' HEALTH AND
WELFARE TRUST FUND FOR NORTHERN
CALIFORNIA, et al.,

Plaintiffs,

v.

PRECISION DRILLING, INC., a California
Corporation,

Defendant.

Case No.: 21-cv-07893 EMC

**PLAINTIFFS' REQUEST TO
CONTINUE CASE MANAGEMENT
CONFERENCE; [PROPOSED] ORDER
THEREON**

Date: August 23, 2022
Time: 1:30 p.m.
Location: Zoom
Judge: Hon. Edward M. Chen

Plaintiffs herein respectfully submit their request that the Case Management Conference, currently on Calendar for August 23, 2022, be continued for approximately sixty (60) days. Good cause exists for the granting of the continuance, as follows:

1. As the Court's records will reflect, a Complaint was filed by Plaintiffs in this matter on October 7, 2021 (Dkt. 1).

2. On or about November 12, 2021, the Summons, Complaint, and related documents were provided to a process server with the instructions to serve the documents upon Defendant. The process server made numerous attempts to serve Tyrone Dennis Amundson, Precision Drilling, Inc.'s CEO and

1 designated Agent for Service of Process according to the California Secretary of State, at four (4)
2 separate addresses, to no avail.

3 3. Due to the unsuccessful attempt at service, Plaintiffs hired an investigative service to
4 perform a “stake-out” on Defendant’s CEO/Agent for Service of Process at his current address located at
5 14528 Chester Avenue Saratoga, California 95070, but were informed that the investigative service was
6 unable to attempt service.

7 4. Plaintiffs diligently attempted to effectuate service of process on Defendant on an
8 ongoing basis since November 12, 2021. Plaintiffs also attempted to serve the Defendant pursuant to
9 California Code of Civil Procedure Section 415.30(a).

10 5. On January 12, 2022, the Court granted Plaintiffs’ request for an extension of time to
11 serve Defendant until April 14, 2022. (Dkt. 13.)

12 6. Defendant was personally served via its CEO and designated Agent for Service of
13 Process, Tyrone Dennis Amundson on March 19, 2022. A Proof of Service of Summons was filed with
14 this Court on March 23, 2022 (Dkt. No. 18).

15 7. Defendant’s deadline to respond to Plaintiffs’ Complaint was April 11, 2022. Defendant
16 has failed to file a responsive pleading or submit any response to date. Plaintiffs filed a Request for
17 Entry of Default of Defendant Precision Drilling, Inc., which was entered by the Clerk on May 10, 2022.
18 (Dkt. 22.)

19 8. As Plaintiffs believe this should resolve informally, Plaintiffs will be making a final
20 attempt to contact Defendant to resolve this matter.

21 9. Accordingly, Plaintiffs respectfully request that the Case Management Conference,
22 currently scheduled for August 23, 2022, be continued for sixty (60) days. If Plaintiffs are unsuccessful
23 in contacting Defendant, or if discussions between the parties are unsuccessful in resolving this matter,
24 Plaintiffs anticipate filing a Motion for Default Judgment within that time.

25 10. There are no issues that need to be addressed by the parties at the currently scheduled
26 Case Management Conference. In the interest of conserving costs as well as the Court’s time and
27
28

resources, Plaintiffs respectfully request that the Court continue the currently scheduled Case Management Conference.

Respectfully submitted.

Dated: August 15, 2022

SALTZMAN & JOHNSON
LAW CORPORATION

By: _____/S/_____

Siddharth Jhans
Attorneys for Plaintiffs

IT IS SO ORDERED.

The currently set Case Management Conference is hereby continued to _____ at _____, and all previously set deadlines and dates related to this case are continued accordingly.

DATED: _____, 2022

Honorable Edward M. Chen
UNITED STATES DISTRICT COURT JUDGE

PROOF OF SERVICE

I, the undersigned, declare:

1. I am a citizen of the United States and am employed in the County of Alameda, State of California. My business address is 1141 Harbor Bay Parkway, Suite 100, Alameda, California 94502.

2. I am over the age of eighteen and not a party to this action.

3. On **August 15, 2022**, I served the following document(s):

**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and depositing the sealed envelope with the United States Postal Service in a sealed envelope with first class postage fully prepaid.

4. The envelope(s) were addressed and mailed as follows:

Precision Drilling, Inc.
c/o Tyrone D. Amundson
21975 Stage Coach Road
Los Gatos, CA 95033

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on **August 15, 2022**, at Vallejo, California.

/S/

Alicia Wood
Paralegal